

Exhibit A

Charles Dedmon - July 15, 2014

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re: §
§
SUPERIOR AIR PARTS, INC., § NO. 08-36705-BJH-11
§
Debtor. §

ORAL DEPOSITION OF
CHARLES DEDMON
INDIVIDUALLY AND AS CORPORATE REPRESENTATIVE OF
SUPERIOR AIR PARTS, INC.
JULY 15, 2014

ORAL DEPOSITION of CHARLES DEDMON,
produced as a witness at the instance of the
Insolvency Administrator of Thielert Aircraft Engines
GmbH, and duly sworn, was taken in the above-styled
and numbered cause on the 15th of July, 2014, from
10:13 a.m. to 4:26 p.m., before Jennifer Quick
Davenport, CSR in and for the State of Texas, reported
by machine shorthand, at the offices of Passman &
Jones, 1201 Elm Street, Suite 2500, in the City of
Dallas, County of Dallas, State of Texas, pursuant to
Notice and the Federal Rules of Civil Procedure.

Charles Dedmon - July 15, 2014

1 A. That's correct.

2 Q. Let's continue on. The next question is:

3 How many parts have -- have you tried to obtain PMA
4 approval for with respect to the Continental and
5 Lycoming aircraft engines?

15:45:28 6 Answer: Several thousand.

7 Question: And that related to piston
8 engines?

9 Answer: Yes.

10 Question: In every single one of those
11 several thousand parts the information was in the
12 public domain?

13 Answer: Yes.

14 Was that your testimony, sir?

15 A. Yes.

16 Q. Was that testimony truthful?

15:45:52 17 A. Yes.

15:46:51 18 Q. What type of dispute was this Rolls-Royce
19 case?

15:46:58 20 A. The dispute was over Rolls-Royce claiming
21 that HEROS had used their data -- had misappropriated
22 their data to prepare PMA applications, I believe all
15:47:25 23 of which were made under the identity statutes.

24 Q. Okay. So it was a trade secrets case, in
25 part?

Charles Dedmon - July 15, 2014

1 A. I assume so, yes.

2 Q. Is that your recollection?

3 A. Yes.

4 Q. And your opinion, in a nutshell, was that
5 there was no misappropriation of trade secrets because
6 all of the information was publicly available?

7 A. In this case, yes.

15:47:58 8 Q. Who were you retained by in that case?

9 A. By Passman Jones.

10 Q. What lawyers?

11 A. I'm sorry?

12 Q. What lawyers?

13 A. Mr. Alexander, and I'm not sure who else
14 worked on the case.

15 Q. Mr. Robison?

16 A. I don't know. I don't remember.

15:48:30 17 Q. Is there something I'm missing here, sir,
18 with respect to the question of whether or not the
19 information in the Superior drawings is all available
20 in the public domain?

21 A. The answer to that would be no. When I was
22 making this testimony, I was speaking particularly
23 about the drawings that were in dispute between
15:48:58 24 Rolls-Royce and HEROS. I wasn't talking about
25 Superior drawings or others, although some of the

Charles Dedmon - July 15, 2014

1 principles would certainly apply.

2 Q. Your testimony in the Rolls-Royce case about
3 the PMA applications that you were familiar with and
4 had made for Continental and Lycoming parts --

5 A. Yes.

6 Q. -- related to the Superior Air Parts,
7 correct?

8 A. Right.

9 Q. And those are the same parts -- some subset
10 of those parts are the parts that are involved in this
11 dispute, correct?

12 A. Yes. At the time that we were talking I was
13 referring to parts that had been developed at Superior
14 when I was there at Superior.

15 Q. Okay. And the time you were talking in this
16 dispute was 2009, I believe, right, 2008, 2009? Let's
17 look. October 22nd, 2009, I believe.

15:50:00 18 A. Right, okay. Yes.

19 MR. SIMON: Let's go off the record for
20 just a moment.

15:50:17 21 (Recess 3:50-4:06.)

16:07:00 22 Q. (By Mr. Simon) I was looking back to see if
23 I asked you this question before, and I don't see that
24 I did. The testimony that you gave in the Rolls-Royce
25 case in your deposition, that was under oath, correct?